

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

§
§
§
§
§
§
§
§
§
§

Case No. 3:21-cv-00259
[Lead Case]

ROY CHARLES BROOKS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

§
§
§
§
§
§
§
§
§
§

Case No. 1:21-cv-00988
[Consolidated Case]

DEFENDANTS' EXHIBIT LIST

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Court's Scheduling Order of December 17, 2021, *see* ECF 97, Defendants provide the following exhibit list for the hearing on the Brooks Plaintiffs' preliminary-injunction motion, scheduled for January 25, 2022.

Number	Name	Offered	Admitted
1.	Partisan Shading Map with Racial and Ethnic Data		
2.	SD10 Partisan Shading Map – S2100		
3.	SD10 Partisan Shading Map – S2168		
4.	North Texas Partisan Shading Map – S2100		

Number	Name	Offered	Admitted
5.	SD10 Change in Partisan Population Map		
6.	Comparison of S2100 and S2168, Performance of SD10 in Statewide Elections – 2012 to 2020		
7.	Election Analysis – S2100 – 2012 General		
8.	Election Analysis – S2100 – 2014 General		
9.	Election Analysis – S2100 – 2016 General		
10.	Election Analysis – S2100 – 2018 General		
11.	Election Analysis – S2100 – 2020 General		
12.	Election Analysis – S2168 – 2012 General		
13.	Election Analysis – S2168 – 2014 General		
14.	Election Analysis – S2168 – 2016 General		
15.	Election Analysis – S2168 – 2018 General		
16.	Election Analysis – S2168 – 2020 General		
17.	SD10 Electoral History – 2002 to 2018		
18.	SD10 General Election – 2002 to 2018		
19.	Election Analysis – H2100 – 2020 General		
20.	Election Analysis – H2316 – 2020 General		

Number	Name	Offered	Admitted
21.	Map Analysis – S2100		
22.	Citizen Voting Age Population Data – S2100		
23.	Map Analysis – S2168		
24.	Senate Population Deviation Map		
25.	Governor Abbott Proclamation – Third Called Session		
26.	U.S. Census Bureau Redistricting Data		
27.	Texas Senate Journal – Third Called Session		
28.	Texas House Journal – Third Called Session		
29.	Examples of the Senate Adopting Plans Offered by Democratic Senators		
30.	Senate Redistricting Committee Hearing Notices and Attachments		
31.	Transcript of Senate Redistricting Committee Hearing – Sept. 11, 2021		
32.	Video of Senate Redistricting Committee Hearing – Sept. 11, 2021		
33.	Transcript of Senate Redistricting Committee Hearing – Sept. 24, 2021		
34.	Video of Senate Redistricting Committee Hearing – Sept. 24, 2021		
35.	Transcript of Senate Redistricting Committee Hearing – Sept. 25, 2021		
36.	Video of Senate Redistricting Committee Hearing – Sept. 25, 2021		

Number	Name	Offered	Admitted
37.	Transcript of Senate Redistricting Committee Hearing – Sept. 28, 2021		
38.	Video of Senate Redistricting Committee Hearing – Sept. 28, 2021		
39.	Transcript of Senate Floor Debate on SB4 – Oct. 4, 2022		
40.	Video of Senate Floor Debate on SB4 – Oct. 4, 2022		
41.	House Redistricting Committee Hearing Notice and Attachments		
42.	Transcript of House Redistricting Committee Hearing – Oct. 11, 2021		
43.	Video of House Redistricting Committee Hearing – Oct. 11, 2021		
44.	Transcript of House Floor Debate on SB4 – Oct. 15, 2021		
45.	Video of House Floor Debate on SB4 – Oct. 15, 2021		
46.	Cancelled House Redistricting Committee Hearings		
47.	Selected Images from the Summer 2021 Quorum Break		
48.	Expert Report and Declaration of Dr. John R. Alford		
49.	EI Voting Analysis – S2100 – 2012 to 2020		
50.	EI Voting Analysis – SD10 2014 Democratic Primary		
51.	SD31 Electoral History – 2014 and 2018		
52.	HD90 Electoral History – 1996 to 2020		

Number	Name	Offered	Admitted
53.	CD33 Electoral History – 2012 to 2020		
54.	<i>Texas Tribune</i> Article – Jan. 22, 2019		
55.	<i>Texas Tribune</i> Article – June 4, 2021		
56.	<i>Texas Tribune</i> Article – Sept. 21, 2021		
57.	<i>Texas Tribune</i> Article – Oct. 7, 2021		
58.	<i>Amarillo Pioneer</i> Article – Oct. 20, 2021		
59.	SD31 Analysis		
60.	SD9 Analysis		
61.	SD9 Electoral History		
62.	Texas Secretary of State – Election Advisory 2021-14		
63.	Texas Secretary of State – Election Advisory 2021-18		
64.	Texas Secretary of State – Election Advisory 2021-23		
65.	Texas Secretary of State – Important Election Dates		
66.	Declaration of Director of Elections Keith Ingram		
67.	Declaration of County Judge David Blackburn		
68.	Declaration of Collin County Elections Administrator Bruce Sherbet		

Number	Name	Offered	Admitted
69.	Declaration of Kendall County Elections Administrator Staci Decker		

Defendants reserve the right to use any and all of these exhibits, or those disclosed by the Brooks Plaintiffs, the right to use and offer into evidence exhibits for impeachment and rebuttal, if necessary, and the right to amend and/or supplement this exhibit list, including with exhibits disclosed during the course of third-party discovery.

Date: January 14, 2022

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Tex. State Bar No. 00798537

BRENT WEBSTER
First Assistant Attorney General

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Tex. State Bar No. 24088531

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410
patrick.sweeten@oag.texas.gov
will.thompson@oag.texas.gov

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 14, 2022, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN